

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIO M. HERRERA-VELUTINI,

Defendant.

CRIMINAL NO. 22-342 (SCC)

MOTION TO WITHDRAW AS COUNSEL OF RECORD

TO THE HONORABLE COURT:

COMES NOW, the law firm of Kasowitz Benson Torres LLP (collectively “Kasowitz”), by and through the undersigned attorneys, respectfully moves this court to grant Kasowitz leave to withdraw as counsel of record for Defendant, Julio M. Herrera-Velutini (“Mr. Herrera”), in the above-captioned case. In support thereof, Kasowitz states:

1. Kasowitz and Mr. Herrera have agreed that Kasowitz will no longer represent Mr. Herrera as counsel of record in the above-captioned matter.
2. For this reason, Kasowitz respectfully requests leave to withdraw as counsel of record for Mr. Herrera.
3. In further support thereof, Kasowitz respectfully notes that the law firms of DLA Piper (Puerto Rico) LLC and the LS Law Firm had entered their appearances on behalf of Mr. Herrera on or about August 29, 2022, and that both firms shall remain as counsel of record for Mr. Herrera in the above-captioned case. As a result, Mr. Herrera will be continuously represented by his lead counsel and original attorneys, and no delays or disruption in the orderly proceeding of

the case will occur as a result of Kasowitz's withdrawal.

4. Accordingly, granting this Motion would not unduly delay the proceedings of the above-captioned case, would not be inequitable and is in keeping with the interests of justice.

WHEREFORE, for the foregoing reasons, the law firm of Kasowitz Benson Torres LLP respectfully requests that this Court permit its withdrawal from this case. For the Court's consideration, a proposed order is attached hereto as Exhibit A.

RESPECTFULLY SUBMITTED, this 13th day of May, 2024

KASOWITZ BENSON TORRES LLP

By: /s/ Robin Rathmell
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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system that will notify all counsel of record.

RESPECTFULLY SUBMITTED, this the 13th day of May, 2024

/s/ Robin Rathmell

Robin Rathmell

EXHIBIT A

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[PROPOSED] ORDER

**[PROPOSED] ORDER GRANTING MOTION TO WITHDRAW
AS COUNSEL OF RECORD**

Upon the Motion to Withdraw as Counsel of Record by Kasowitz Benson Torres LLP (“Kasowitz”), and for good cause shown therein,

IT IS HEREBY ORDERED that Kasowitz is withdrawn as counsel of record for Defendant Julio M. Herrera-Velutini in the above-captioned matter; and

IT IS FURTHER ORDERED that Kasowitz no longer receive electronic notices from the Court’s CM/ECF system in the action.

SO ORDERED this _____ day of _____, _____.

Hon. Silvia Carreño-Coll
United States District Judge